

**IN THE UNITED STATES BANKRUPTCY
COURT FOR THE SOUTHERN DISTRICT OF
TEXAS HOUSTON DIVISION**

In re:	§	
	§	Case No. 20-33948 (MI)
Fieldwood Energy III LLC, et al.,	§	
	§	Chapter 11
Post-Effective Date Debtors¹.	§	
	§	Jointly Administered

**STIPULATION EXTENDING RESPONSE DATE AND RESETTING HEARING DATE ON
PLAN ADMINISTRATOR’S OBJECTION TO PROOFS OF CLAIM FILED BY TALOS
ENERGY OFFSHORE LLC, TALOS ENERGY LLC, TALOS ENERGY INC.,
AND TALOS PRODUCTION INC.
[Relates to Dkt. No. 2835]**

This stipulation and agreement (the “**Stipulation**”) is entered into by and among (i) David Dunn, the plan administrator (the “**Plan Administrator**”) appointed pursuant to the Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Docket No. 2016])²; and Talos Energy Offshore, LLC, Talos Energy LLC, Talos Energy Inc., and Talos Production Inc. (collectively, “**Talos**”) regarding the Plan Administrator’s Objection to Proofs of Claim of Talos Energy Offshore, LLC, Talos Energy LLC, Talos Energy Inc., and Talos Production Inc. [Docket No. 2835] (the “**Objection**”). The Parties hereby stipulate and agree as follows:

WHEREAS, on or about November 25, 2020, Talos timely filed Proofs of Claim Numbers

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtor), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Plan.

724, 780 and 786 (collectively, the “**Talos Initial Claims**”).

WHEREAS, on or about March 25, 2022, Talos timely filed Proofs of Claim Numbers 1083, 1085 and 1088 asserting administrative expense claims (collectively, the “**Talos Administrative Claims**”).

WHEREAS, the Plan Administrator filed his Objection on August 15, 2023, which included a deadline of September 14, 2023 for Talos to respond to the Objection (the “**Response Date**”) and an initial pre-trial hearing on the Objection set for October 2, 2023 at 10:30 a.m. CT (the “**Pre-Trial Hearing**”).

WHEREAS, on September 12, 2023, the Parties agreed to extend Talos’ Response Date to October 13, 2023 and to reset the Pre-Trial Hearing to November 6, 2023 at 10:00 a.m.

WHEREAS, on October 13, 2023, the Parties agreed to further extend Talos’ Response Date to December 15, 2023 and reset the Pre-Trial Hearing to January 24, 2024 at 9:00 a.m.

WHEREAS, the Parties have agreed to enter into and jointly submit this Stipulation further extending the Response Date in connection with the Objection.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. The Response Date is extended to and through December 15, 2023, subject to further extensions based on the Parties’ agreement.

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first written below.

**BOND ELLIS EPPICH SCHAFFER JONES PORTER HEDGES LLP
LLP**

/s/ Aaron Guerrero

Ken Green
Texas Bar No. 24036677
Aaron Guerrero
Texas Bar No. 24050698
Bryan Prentice
Texas Bar No. 24099787
950 Echo Lane, Suite 120
Houston, Texas 77024
(713) 335-4990 telephone
(713) 335-4991 facsimile
Ken.green@bondsellis.com
Aaron.guerrero@bondsellis.com
Bryan.prentice@bondsellis.com

**ATTORNEYS FOR DAVID DUNN, PLAN
ADMINISTRATOR FOR THE POST-
EFFECTIVE DATE DEBTORS**

By: Megan Young-John

Eric M. English
Megan Young-John
Texas State Bar No. 24062714
1000 Main Street, 36th Floor
Houston, TX 77002
Telephone (713) 226-6000
Facsimile: (713) 226-6248
Email: eenglish@porterhedges.com
myoung-john@porterhedges.com

**ATTORNEYS FOR TALOS ENERGY
OFFSHORE LLC, TALOS ENERGY
LLC, TALOS ENERGY INC., AND
TALOS PRODUCTION INC.**

Certificate of Service

I hereby certify that on the 10th day of November, 2023 a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Megan Young-John

Megan Young-John